

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EARTHA AUGUSTIN,

Plaintiff,

-vs-

ENLARGED CITY SCHOOL DISTRICT OF  
NEWBURGH, et. al, etc.,

Defendants.

Civil Action No. 07 Civ 5709 (WCC)

SECOND SET OF ADDITIONAL  
INITIAL DISCLOSURES BY  
DEFENDANTS

Defendants, by their attorneys, Shaw, Perelson, May & Lambert, LLP, as and for their Additional Initial Disclosures pursuant to Fed. R. Civ. P. 26 (a) (1) hereby provide the following information in the order provided by Rule 26 (a) (1):

A. Individuals likely to have discoverable information concerning the lawful basis for the actions of the defendants of which the plaintiff complains:

30. Beverly Johnson, Assistant Principal, Newburgh ECSD

31. Ralph Malloy, Assistant Principal, Newburgh ECSD

32. Margaretta St. Clair, Long Term Leave Replacement, Newburgh ECSD

33. Rikki Pearson, Teaching Assistant, Newburgh ECSD

**The defendants reserve their right to supplement this list.**

B. Documents, etc. in possession of defendants that defendants may use to support their claims or defenses.

1. Applications and portions of personnel records of Beverly Johnson

2. Applications and portions of personnel records of Ralph Malloy

3. Applications and portions of personnel records of Margaretta St. Clair.

4. Dr. Winchester-Vega treatment records of Plaintiff.

**The defendants reserve their right to supplement this list.**

Dated: August 26, 2008

SHAW, PERELSON, MAY& LAMBERT, LLP  
Attorneys for Defendants

by: \_\_\_\_\_/S\_\_\_\_\_  
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